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Attorneys for Defendant Quest Diagnostics Incorporated

**IN THE UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY**

IN RE: AMERICAN MEDICAL
COLLECTION AGENCY, INC.
CUSTOMER DATA SECURITY
BREACH LITIGATION

Civil Action No. 2:19-MD-02904
(MCA-MAH)

*This Document Relates To:
All Actions Against Quest Diagnostics, Inc.
and Optum360, LLC.*

**DECLARATION OF HEATHER BENZMILLER SULTANIAN IN
SUPPORT OF MOTION TO SEAL CONFIDENTIAL MATERIALS**

I, Heather Benzmilller Sultanian, do declare and state as follows:

1. I am a partner of the law firm Sidley Austin LLP and counsel to Defendant Quest Diagnostics Incorporated (“Quest”) in the above-captioned proceeding.

2. I am submitting this Declaration based upon my personal knowledge, information, and belief.

3. I submit this Declaration in support of the Motion to Seal Confidential Materials, namely, portions of the Special Master Discovery Order and accompanying transcript (Dkt. No. 742) (hereinafter, the “Confidential Materials”).

4. The Confidential Materials contain information that has been designated as Confidential or Highly Confidential by the Parties and is subject to the Confidentiality Order entered in this case or is otherwise confidential.

6. As set forth in the Index to the Declaration of Donald Houser, Quest asserts, upon information and belief, that the Confidential Materials contain Quest’s confidential and proprietary business information.

7. As set forth in the Index to this Declaration, Quest asserts, upon information and belief, that if the Confidential Materials become available to the public, third parties may potentially use such information to its detriment.

8. Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury that the foregoing is true and correct.

Signed:

Dated: November 13, 2024

/s/ 
Heather Benzmilller Sultanian